

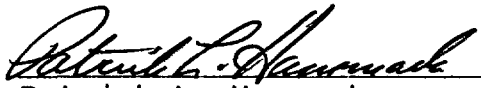
AFTER ACTION MEMORANDUM

HARRY HINES DRUM WAREHOUSE
Dallas, Dallas County, Texas

Cerclis ID# TXD987980976

Site ID # R4

August 1, 1989 - May 16, 1990


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5/6/91
Date

162876



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I. SUMMARY OF EVENTS

A. Cause of the Incident:

While investigating a drum dump location near the intersection of Walnut Hill and Spangler Road in Dallas, Dallas County, Texas, the EPA Office of Criminal Investigation (OCI) obtained additional information through the interrogation of suspects concerning a warehouse at 10333 Harry Hines Boulevard from which the drums were believed to have originated. A third drum dump location on Kirnwood Street, between Chaucer and Bainbridge Streets was also identified. Because the drums at the two remote dump sites were originally located at the warehouse, it was decided that the three locations would be dealt with as one site.

The warehouse is located in a light industrial area with Aaron Sells Furniture and Earl Sheib Auto Painting. There is also a heavily populated trailer park located approximately 75 feet from the west side of the warehouse. The two dump sites are in open fields.

B. Initial Situation:

On 1 August 1989, the EPA Emergency Response Branch (ERB) was contacted by the EPA OCI concerning illegal dumping of approximately 40 drums in an open field on Spangler Road near Walnut Hill in Dallas, Dallas County, Texas (hereafter referred to as the 'north dump site'). Some of the drums had been overpacked by Southern Waste Management, a City of Dallas clean-up contractor. The On-Scene Coordinator (OSC) and Region 6 Technical Assistance Team (TAT) investigated and sampled a representative number of drums. Air monitoring for organic vapors, ionizing radiation, and explosive atmosphere near the drums was performed; no readings above background were obtained. Twenty-seven samples were collected to represent the 42 drums which were found in the field. During the investigation, a truck with additional drums arrived and was detained by representatives of the EPA-OCI and the Federal Bureau of Investigation (FBI). Eight drums were observed on the truck, seven of which were labeled "70% Hydrofluoric Acid".

The driver of the truck led federal officials to an unoccupied warehouse at 10333 Harry Hines Boulevard. As a precautionary measure, the Dallas Fire Department (DFD) evacuated two adjacent buildings and a nearby trailer park. EPA entered the warehouse to perform initial air monitoring to assess the potential threat posed by the hazardous substances in the drums located inside. No readings above background were obtained. An initial inventory of the drums was obtained. Labels observed on the drums included: sulfuric acid, phosphoric acid, styrene, toluene,

trisodium phosphate, ferrous sulfate, "Action", various adhesives and pesticides. A more detailed list of materials is located in the site file. The majority of the interior of the warehouse floor was covered with spilled drum material. Some of this material was spilling from the warehouse onto the parking lot and into the city storm drainage system. Because of recent rain, the Dallas City Street Department placed sand in front and back of the warehouse in the storm drains to collect any contaminated run-off from the area. One drum and a large amount of spilled or dumped material were found behind the warehouse. No samples were taken at this time.

Later that evening, the truck driver led federal officials to another drum dump site in southern Dallas on Kirnwood Street, between Chaucer and Bainbridge Streets (hereafter referred to as 'South Dump Site'). There were 14 drums in the field at this location. Several of the labels indicated that the drums might contain rust inhibitor, hydrofluoric acid, and 2,4-d-containing herbicide.

C. Efforts to Obtain Response by Responsible Parties:

Because the OSC determined the site required immediate attention, there was little time to locate all potentially responsible parties. When the warehouse owner was contacted, he refused to conduct the removal, but allowed access to the premises. At the time of the emergency removal action, no other potentially responsible parties could be contacted. Future enforcement activities by EPA will be dependent upon the emergence and viability of potentially responsible parties. The Internal Revenue Service and the EPA/OCI were conducting criminal investigations at the time of the emergency removal of the companies possibly involved.

D. Organization of the Response:

Due to the fact that the warehouse and both dump locations contained leaking drums of unknown hazardous substances, a classic emergency removal was initiated on 1 August 1989.

The OSC mobilized ERCS to the site and began the removal action on 1 August 1989. The EPA OSC was Pat Hammack. The ERCS Response Manager was Robert Koentop of Peterson-Riedel Services from Jackson, Mississippi and Bill Clemons was the TAT Project Manager for Ecology and Environment.

E. Resources Committed:

The response began with verbal approval from the Regional Administrator. An Action Memorandum was submitted and approved on August 7, 1989 with a total ceiling of \$1,000,000 and an ERCS ceiling of \$700,000.

A Delivery Order was issued to the ERCS contractor on August 1, 1989 for the amount of \$250,000 to provide equipment and manpower and procure services for the removal of all hazardous waste. The Delivery Order was modified on August 9, 1989 increasing the obligated amount to \$700,000.

The project costs are as follows:

EXTRAMURAL

Emergency Response Clean-up Services.....\$336,003.87

Technical Assistance Team (as of 6/9/90).....\$43,437.00

INTRAMURAL

EPA\$345,175.88

The ERCS total was taken from the latest voucher and all outstanding charges and bill are included. No major adjustments are expected. The TAT and EPA totals are taken from the Financial Management System Report.

F. Location of the Contaminants:

1. North Dump Site

The North Dump Site was located near the intersection of Walnut Hill and Spangler Road. Approximately 43 drums were found at this dump site. These drums were believed to have originated from the warehouse on Harry Hines Boulevard and, thus, contain hazardous substances similar to those found in drums at that location. These drums were overpacked and restaged at the warehouse for transportation and disposal.

2. South Dump Site

The South Dump Site was located on Kirnwood Street, between Bainbridge and Chaucer Streets. Approximately 14 drums were located at this dump site. These drums also originated at the warehouse on Harry Hines Boulevard and contained hazardous substances similar to those found there. All drums and contaminated soil were restaged at the warehouse.

3. Warehouse

The warehouse, located at 10333 Harry Hines Boulevard, contained approximately 200 drums of various hazardous substances including hydrofluoric acid, phosphoric acid, styrene, toluene, pesticides, and herbicides. Many of the drums' contents were spilled or leaking onto the warehouse floor.

G. Comments on the Effects on Natural Resources:

The only natural resource adversely affected by the hazardous substances found at the warehouse and the two dump sites was soil. Spilled and leaking drums had contaminated the soil in the immediate area of the two dump sites and a small area behind the warehouse.

H. Efforts to Replace or Restore Damaged Natural Resources:

The contaminated soil was excavated and the areas back-filled to the original grade to prevent any further migration of the hazardous materials at all locations. Subsequent to the excavation behind the warehouse, cement was mixed with the soil to solidify any liquids which might still be present.

I. Threat Abatement Action:

As a result of the removal action, approximately 250 drums were sampled and transported offsite for proper disposal. Contaminated soil was excavated from both drum dump sites and from behind the warehouse. The soil from the dump sites was placed in overpacks and transported to the warehouse with the other drums from those areas. The soil excavation was completed behind the warehouse and the area back-filled to its original grade on 19 August 1989. The contaminated soil was transported offsite for appropriate disposal on 17-18 August 1989. The majority of the drums were transported to a disposal facility on 16-17 November 1989. The final drums were removed from the site for disposal on 15 May 1990. Most site activities were conducted in level "B" protective equipment due to the chemicals present.

1. North Dump Site

Upon arrival at the north drum dump site initial air monitoring was performed to determine the severity of threat posed by hazardous substances contained in and leaking from the drums. ERCS crews were brought onsite to overpack the leaking drums to prevent further spread of contamination. Southern Waste Management (SWM) was contracted by the Dallas Fire Department (DFD) to stabilize and secure the site. Once stabilized, SWM moved the 43 drums from the North Dump Site location to the warehouse located at 10333 Harry Hines Boulevard to facilitate disposal by having all of the drums at one location. The drums from the north dump site were stored outside the warehouse until an area could be cleared for them inside. After the drums were removed at the north site, excavation of the contaminated soil began. The excavated soil was placed in drums and also transported to the warehouse by Southern Waste Management under a contract with the City of Dallas.

2. South Dump Site

Leaking drums at the south dump site were promptly placed in overpacks by the ERCS crew to prevent further contamination of the area. Southern Waste Management (SWM) stabilized the remaining drums and secured the site until the drums could be removed. SWM later transported 14 drums to the warehouse at 10333 Harry Hines Boulevard. The drums were stored outside the warehouse until an area could be cleared for them inside. Again, the drums were moved to the warehouse to facilitate disposal from one location. As with the North Dump Site, the contaminated soil was excavated, placed in drums, and transported to the warehouse for storage until a disposal facility could be found.

3. Warehouse

Upon arrival at the warehouse location, the OSC and a representative from EPA/OCI opened the door of the warehouse. Upon detection of odor, the Dallas Fire Department evacuated the residents of a nearby trailer park until air monitoring could be performed. Twenty-four hour protection during removal action was provided by the Dallas Fire Department to prevent accidental exposure or injury to non-authorized persons. The ERCS crew steam-cleaned the parking lot area to reduce the spread of contamination from rainwater run-off.

As stated earlier, SWM was contracted by the city of Dallas to transport the drums from the North and South Dump Sites to the warehouse to facilitate disposal. These drums were secured outside until an area could be cleared for them inside the warehouse. Once moved inside, all of the drums (from the two dump sites and the warehouse) were staged for sampling and 225 samples were taken. An ERCS chemist performed hazard categorization tests to determine hazard classes and possible compatibility of any samples. Based on results of these tests, the samples were composited into 31 samples prior to shipment for analysis. A total of 37 samples were sent for waste profile analysis (31 from the established compatibility classes, 4 duplicates, and 2 surface soil composites from the excavated area behind the warehouse). The samples were analyzed for: priority pollutants (including metals), pesticides, herbicides, cyanide, sulfide, and hexavalent chromium (Additional information on the drum samples is located in the TECHNICAL section of the site file). The OSC demobilized the site while awaiting the laboratory results to determine proper disposal method and facility. Warning signs and banner tape were posted around the warehouse prior to demobilization. After receiving the data from the laboratory, the drums were transported to appropriate disposal facilities based on the results. As the drums were removed from the warehouse, the floor was cleaned to remove any remaining potential contamination.

During the removal action, several 8-hour air samples to analyze for aromatic hydrocarbons, pesticides, inorganic acids, and cresols were taken (Additional information on the air samples is located in the TECHNICAL section of the site file). These samples were taken to determine the average daily exposure to the crews working in the warehouse during the removal action.

A contaminated area was discovered behind the warehouse where chemicals had leaked or were dumped from the building. Contaminated liquid was pumped into a drum for proper disposal. The fence was then removed and the contaminated soil was excavated. Cement was mixed with the remaining soil to solidify any liquid contaminant that might still be present. The excavated soil was placed in a roll-off box and 5 dump trucks to be transported to Chemical Waste Management of Carlyss, LA. The excavated area was then back-filled to its original grade and the fence replaced.

I. Public Information/Community Relations Activities:

The public was informed of the situation and the actions taken to correct it through two local television stations news broadcasts. A local newspaper also provided documentation of the removal activities for the local citizens.

II. EFFECTIVENESS OF THE REMOVAL

A. Actions Taken by the Responsible Party:

No viable responsible party could be found that would conduct the removal action when required.

B. Local Forces:

The DFD provided 24-hour protection during the removal action. A representative from the City Health Department visited the site to determine if there were any health risks to residents of the nearby trailer park. Jesse Beard and Richard Guinn of Dallas Water Utilities visited the site to assess the possibility of any of the hazardous substances entering the local drainage system and further spreading contamination. The City of Dallas contracted with SWM to handle and transport the drums from the remote drum areas to the warehouse.

C. State Forces:

Cathy Chiles of the Texas Water Commission (TWC) visited the site to determine if there was any threat of a release of the hazardous substances into area water supplies and to assist in the manifesting of hazardous shipments from the site.

D. Federal Agencies and Contractors:

The EPA conducted the removal action with ERCS and TAT contractors to effectively mitigate threats presented by the site. Approximately 250 drums from the three locations and soil excavated from the two dump areas were overpacked and transported offsite for appropriate disposal. Approximately 80 cubic-yards of contaminated soil was excavated from a contaminated area behind the warehouse and transported offsite for disposal as well.

In conjunction with the EPA/OCI action, Danielle Aleman of the FBI began an investigation into the identification of the responsible party. The FBI was working in conjunction with EPA/OCI representatives Tom Kohl, Stephen Wells, Fred Burnside, David Miefski, Kathleen Hughes, and Cheryl Seager. The Internal Revenue Service, represented by Cheryl Powers and Darla Crooks, was also conducting a criminal investigation of the companies involved.

III. PROBLEMS ENCOUNTERED

The removal action was classified as a classic emergency. The urgency of the situation did not permit the lengthy investigations necessary to define the exact quantity of wastes and extent of contamination. Pre-planning activities were conducted during the initial stages of the on-site response. As a result, the project scope had to be changed to deal with the two additional locations which were discovered subsequent to the investigation of the north dump site.

During the actual removal of the waste, two drums of pesticides were overlooked by the ERCS chemist. These drums had not been profiled for disposal which caused the additional delay in closing the site. Because of the material in the drums, great difficulty was encountered in locating a facility for disposal.

IV. RECOMMENDATIONS

It would be incumbent on the ERCS contractor to enlist the services of more chemist. The reason the drums were missed during profiling was because the site chemist was concurrently working on three other removal sites. He was overpowered by the work and just simply failed to catch the mistake until the OSC asked about the marked pesticide drums.